

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

ANDRES MEJIA,)	
)	
CHRISTINA KIM PHILIBOTTE, and)	
)	
NATIONAL EDUCATION)	
ASSOCIATION-NEW HAMPSHIRE,)	
)	Civil No. 1:21-cv-01077-PB
Plaintiffs,)	
)	
v.)	
)	
FRANK EDELBLUT, in his official)	
capacity only as the Commissioner of the)	
New Hampshire Department of Education,)	
)	
JOHN M. FORMELLA, in his official)	
capacity only as the Attorney General of the)	
State of New Hampshire,)	
)	
AHNI MALACHI, in her official capacity)	
only as the Executive Director of the New)	
Hampshire Commission for Human Rights,)	
)	
CHRISTIAN KIM, in his official capacity)	
only as the Chair of the New Hampshire)	
Commission for Human Rights,)	
)	
KEN MERRIFIELD, in his official capacity)	
only as the Commissioner of the)	
Department of Labor,)	
)	
Defendants.)	

**ASSENTED-TO MOTION FOR THE ADMISSION, *PRO HAC VICE*, OF LEAH
WATSON AS ADDITIONAL COUNSEL FOR PLAINTIFFS MEJIA AND PHILIBOTTE**

Pursuant to Local Civil Rule 83.2(b), I hereby move for the admission, *pro hac vice*, of Leah Watson, an attorney with the American Civil Liberties Union, and a member of the Bars of the District of Columbia and the District of Maryland since 2013, as additional counsel for

Plaintiffs Andres Mejia and Christina Kim Philibotte in this case. Attorney Watson's affidavit is filed herewith. All parties assent to the relief requested in this motion.

WHEREFORE, I respectfully request that this Honorable Court:

- A. Grant this Motion for Admission Pro Hac Vice of Leah Watson as additional counsel for Plaintiffs Andres Mejia and Christina Kim Philibotte; and
- B. Grant such other and further relief as may be just and equitable.

Date: December 22, 2021

Respectfully submitted,

/s/ Gilles Bissonnette

Gilles Bissonnette (N.H. Bar No. 265393)
American Civil Liberties Union of New Hampshire
18 Low Avenue
Concord, NH 03301
T: (603) 225-3080
gilles@aclu-nh.org

SUPPORTING AFFIDAVIT OF COLIN MCGRATH, ESQ.

Leah Watson, Esq., pursuant to Local Rule 83.2(b)(1), hereby certifies that:

1. My office is located at 125 Broad Street, 18th Floor, New York, NY 10004 and my phone number is (212) 549-2500.
2. I am a member in good standing of the Bar of the District of Columbia and the federal Bar of the District of Maryland and submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I am not presently admitted to any other courts.
3. I have not been the subject of any past or pending disciplinary matters and have no prior felony or misdemeanor criminal convictions.
4. My *pro hac vice* status has never been denied or revoked in any court.

Dated: December 22, 2021

New York, New York

/s/ Leah Watson

Leah Watson

American Civil Liberties Union

125 Broad St., 18th Floor

New York, New York 10004

Telephone: (212) 519-2500

Facsimile: (212) 549-2654

Email: LWatson@aclu.org